

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

SHAWN SMITH

PLAINTIFF

v.

CIVIL ACTION NO. 1:20-cv-00345-HSO-RHWR

POWER DYNAMICS INNOVATIONS, LLC

DEFENDANT

**JOINT MOTION TO EXTEND DISCOVERY AND
DISPOSITIVE MOTION DEADLINES**

COME NOW Defendant Power Dynamics Innovation, LLC (“Power Dynamics” or “Defendant”), and Plaintiff Shawn Smith (“Plaintiff” or “Smith”) (collectively “the Parties”), by and through their counsel of record, and jointly submit this Joint Motion to Extend Discovery and Dispositive Motion Deadlines, and in support thereof, state as follows:

1. The Plaintiff and Defendant desire, by agreement, to extend the discovery and dispositive motion deadlines by sixty (60) days and that the Scheduling Order be amended to extend the other relevant deadlines as necessary.

2. The case management order was entered May 14, 2021, setting the discovery deadline for January 14, 2022 and the dispositive motion deadline for January 28, 2022. Trial is set for August 8, 2022.

3. Plaintiff and Defendant have additional discovery that is needed that the parties could not complete during the original discovery time period. Scheduling issues and discovery conducted to date have made this requested extension necessary. In particular, Defendant propounded interrogatories and requests for production on May 18, 2021. (Docs. 15, 16.) Plaintiff has not responded, and Defendant is not able to move forward with Plaintiff’s deposition until Plaintiff responds to written discovery. The Parties are attempting to work

together in good faith in order to avoid a formal discovery motion and additional time is needed to resolve this discovery issue, depose Plaintiff and conclude discovery.

4. Plaintiff and Defendant desire, by agreement to request a sixty (60) day extension for the discovery and dispositive motion deadlines and that the Scheduling Order be amended to extent the other relevant deadlines as necessary.

5. This Motion is not interposed for purposes of delay, but rather so that the interests of justice and judicial economy may be served.

6. Due to the nature of this Motion, Defendant requests that it be relieved of the requirement to submit a supporting memorandum pursuant to L.U.Civ.R. 7(b)(4).

WHEREFORE, Defendant and Plaintiff request that the Court enter and extend the discovery and dispositive motion deadlines for sixty (60) days and that the Court grant such other, further and different relief as the Court deems fair and just.

Respectfully submitted, this the 10th day of January, 2022.

POWER DYNAMICS INNOVATIONS, LLC,
Defendant

BY: /s/ Robin Banck Taylor
ROBIN BANCK TAYLOR (MSB NO. 100195)

ATTORNEY FOR DEFENDANT

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Robin Banck Taylor, hereby certify that on this date, I electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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ATTORNEYS FOR PLAINTIFF

This the 10th day of January, 2022.

/s/ Robin Banck Taylor
ROBIN BANCK TAYLOR